

Paul A. Palmer Jr.
6555 Sugarloaf Pkwy Ste-307
Duluth, GA. 30097
470-292 7313
Plaintiff in Pro Se

7/18/19

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

JUL 22 2019

JAMES N. HATTEN, Clerk

By: *[Signature]* Deputy Clerk

IN THE United States
District Court For Northern District
of Georgia Atlanta Division

Paul A. Palmer Jr.,

Plaintiff,

v.

Cvs Pharmacy, INC. LLC.,

Defendant

Civil Action

File no. 1:19-cv-03178
-EIR

Amended
Complaint

Demand for Jury Trial

Rule 15. Amended and Supplemental Pleadings. paragraph (C) Relation Back of Amendments (C) The amendment changes the party or the naming of the party against whom

a claim is asserted,

Jurisdiction

1. The United States District Court for The Northern District of Georgia, Atlanta Division, 28 U.S. Code § 1332. The matter in controversy exceeds the sum of \$75,000.

Venue

2. I'm suing this matter in court due to negligence. / Premises liability. Venue is proper pursuant to 28 USC § 1391 because Georgia CVS Pharmacy, LLC. resides in the same state as Plaintiff, and District Court.

Parties

3. Plaintiff (Paul A. Palmer Jr.) resides 6555 Sugarloaf Pkwy Ste-307 Duluth, GA. 30097
4. Defendant (Georgia CVS Pharmacy Inc. LLC.) resides in Georgia, Address unknown

Statement of facts

5. Nov. 24, 2018 at 1:19pm, I was

an invitee into the Cvs pharmacy Location at 10710 State Bridge Rd. Alpharetta Ga. 30022. Upon entering the store I was called to the register by the store clerk Christopher, I was there to reload a grandot card. As I was exiting the store I tripped over a protruded part of the store counter, that was loose, below knee level, with an obstructed view by a gumball machine and other items that was out on display during the holiday season. This item is the end part of the counter that sticks out ~~at~~ the end. As I tripped over the end part of the counter hitting my left knee, store clerk Christopher asked me was I ok, he was a witness to the accident. I felt severe pain immediately in my Left leg, back and neck. I had trouble walking out the store i couldn't call the paramedics because I had my wife and kids in the car. When I arrived home my leg was swollen twice the size. that's when I called the store

and made a claim with the manager. He advised me that we reviewed the store tape and made the claim with risk management. I couldn't walk that night, but I went to the Emergency room 11/25/19, 5am to be treated for my injuries. An Xray was taken and a referral to an orthopedic surgeon. Once I seen the orthopedic surgeon He ordered a Mri, The results came back I had a bucket Handle tear (meniscus) with a mcl and acl sprain. He referred me to physical Therapy and made a consult for surgery. I did therapy for a month before surgery the Dri stopped it due to Chronic pain and increase swelling. My Surgery was performed 1/25/19 at 7:30 AM he went into my knee six times making incisions holes to correct the problem. He advised my wife that my knee cap was Crooked. On 2/18/19 I was cleared for Physical therapy for six more

weeks. This is a new injury that was sustained, from the accident in CVS Pharmacy. I had to basically learn how to walk all over again in therapy. I live with swelling, chronic pain and reduced mobility. This injury has caused a strain on my life and my relationship with family and my wife.

Claim I

1. Premises liability - the injury was caused by some type of unsafe or defective condition on someone's property.

Request for Relief

Wherefore, The plaintiff requests:

1. Compensatory damages, including general and special damages according to proof, and punitive damages due to client disregard of others
2. Any further relief which the court may deem appropriate.
3. \$40,000 + medical bills, pain & suffering, future medical expense, Loss of Consortium, Disfigurement, Loss of enjoyment of Life

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JAMES N. HATTEN, Clerk
Deputy Clerk

Demand for Jury Trial

1. BY Plaintiff hereby requests a jury trial on all issues raised in this complaint.

Dated: July 18, 2019

Paul A. Palmer Jr.

Paul A. Palmer Jr.

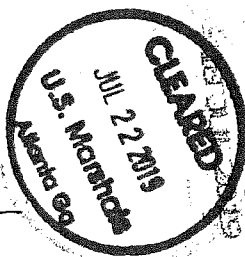
Plaintiff Pro-Se

Complaint

I have pictures to back up my claim, including the store camera video is evidence

Paul A. Palmer Jr.
6555 Sugarleaf Pkwy Ste-307
Duluth, GA 30091

United States District Court
for the Northern District of
Georgia Atlanta Division
US District Court Clerk
75 Ted Turner Dr. NW Suite 2011
Atlanta, GA 30303



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